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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

6:22-cr-00262-MC

v.

**FOURTH BILL OF PARTICULARS
FOR FORFEITURE OF PROPERTY**

**MICHAEL MALEKZADEH and
BETHANY MOCKERMAN,**

Defendants.

The United States of America hereby files the following Bill of Particulars for Forfeiture of Property.

The United States gives notice that in the forfeiture allegation of the Information, the United States is seeking forfeiture of the following property:

\$6,100,000.00 seized from Oregon Community Credit Union;

\$290,000.00 seized from Oregon Community Credit Union;

\$123,000.00 Monetary Instrument;

80 luxury high end watches;

101 luxury high end handbags, e.g. clutches, purses, duffle bags;

42 pieces of miscellaneous fine jewelry;

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One pair of Luis Vuitton sunglasses;

One pair of Nike/Louis Vuitton Shoes;

\$31,286.50 seized from Selco Community Credit Union;

\$7,000.00 seized from Selco Community Credit Union;

\$113,000 seized from Oregon Community Credit Union;

\$825,977.92 Monetary Instrument;

\$43,000.00 U.S. Currency, proceeds from sale of Lexus GX 460;

\$19,200.00 U.S. Currency, proceeds from sale of personal property items; and

\$206,342.00 U.S. Currency, from Oregon Community Credit Union.

Dated: March 18, 2025

Respectfully submitted,

WILLIAM M. NARUS
Acting United States Attorney

s/ *Gavin W. Bruce*
GAVIN W. BRUCE
Assistant United States Attorney